

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al

Debtors

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In re:

THE FINANCIAL OVERSIGHT AND  
MANAGAMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO SALES TAX FINANCING  
CORPORATION

Debtor

PROMESA Title III

No. 17 BK 3283-LTS

(Jointly administered)

PROMESA Title III

No. 17 BK 3284-LTS

**JOINDER OF MOTION IN LIMINE BY PROSOL-UTIER<sup>1</sup>**

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<sup>1</sup>The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (I) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686, (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID\_ 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474), and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS)(Last Four Digits of Federal Tax ID: 3747.

TO THE HONORABLE COURT

Come now, the parties identified below, who respectfully state, pray, and request as follows:

I. The appearing parties:

The parties who appear through this objection are the following:

a) René Pinto Lugo; VAMOS, Movimiento de Concertación Ciudadana Inc., (VAMOS); and the following labor unions: Unión de Empleados de Oficina y Profesionales de la Autoridad de Edificios Públicos, (UEOGAEP); Unión Insular de Trabajadores Industriales y Construcciones Eléctricas Inc., (UITICE); Unión Independiente de Empleados de la Autoridad de Acueductos y Alcantarillados (UIA); Unión de Empleados de Oficina Comercio y Ramas Anexas, Puertos, (UEOCRA); Unión de Empleados Profesionales Independientes, (UEPI); Unión Nacional de Educadores y Trabajadores de la Educación, (UNETE); y la Asociación de Inspectores de Juegos de Azar, (AIJA). These parties are Plaintiffs in adversary case 18-AP-0041 (LTS) before this Court; and

b) Manuel Natal-Albelo who is a legislator and a member of the House of Representatives of the Commonwealth of Puerto Rico.

II. The joinder <sup>2</sup>

In the case at bar, PROSOL-UTIER filed on January 14<sup>th</sup>, 2019 a Motion in Limine regarding two statements submitted by the Financial Oversight and Management Board (FOMB), statements by Natalie Jaresko and David Brownstein. See Dockets 4790 and 501 in the respective cases.

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<sup>2</sup>This joinder does not constitute a waiver by the appearing parties as Plaintiffs of the allegations and arguments set forth in the Amended Adversary Complaint filed by them as part of case 18-AP-41 in this Title III proceedings, as far as the constitutionality of the PROMESA provisions pursuant to which the FOMB was created and its powers, and the public debt of the Government of Puerto Rico.

Through this Motion the appearing parties join that Motion in Limine including its attachments, requesting the Court to take notice of this joinder for all pertinent purposes.

WHEREFORE, it is respectfully requested for the Court to take notice of this joinder for all pertinent legal purposes and to grant the relief requested therein.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 15<sup>th</sup> day of January, 2019.

I hereby certify that on this same day a true and exact copy of this Objection was filed through the CM/ECF Systems of this case, which will send notification of such filing to all participants and Standard Parties.

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